

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

MIRROR WORLDS TECHNOLOGIES,  
LLC,

Plaintiff,

vs.

APPLE, INC., et al.,

Defendants.

Civil Action No. 6:13-CV-00419-LED

**Jury Demanded**

**Plaintiff Mirror Worlds Technologies' Reply to Counterclaims  
of Defendant Microsoft**

Plaintiff Mirror Worlds Technologies, LLC (“Mirror Worlds” or “Plaintiff”) hereby answers and replies to the counterclaims of Defendant Microsoft Corporation (“Microsoft”). The paragraphs set forth in this reply are numbered to correspond with the paragraph numbers in Microsoft’s counterclaims; accordingly, the first paragraph is number 1. All of the allegations of the counterclaims not specifically admitted herein are specifically denied.

**Counterclaims**

1. Plaintiff denies the allegations contained in paragraph 1 of Microsoft’s counterclaims, except that it admits that Microsoft filed counterclaims for a declaratory judgment of invalidity and non-infringement.

2. Upon information and belief, Plaintiff admits the allegations contained in paragraph 2 of Microsoft’s counterclaims.

3. Plaintiff admits the allegations contained in paragraph 3 of Microsoft’s

counterclaims.

4. Plaintiff denies the allegations contained in paragraph 5 of Microsoft's counterclaims except as follows. Plaintiff admits that the counterclaims asserted in Microsoft's counterclaims arise under the patent laws of the United States, that Microsoft seeks declaratory relief under the Federal Declaratory Judgment Act, and that this Court has subject matter jurisdiction over these claims. Plaintiff denies that Microsoft is entitled to the relief it seeks.

5. Plaintiff denies the allegations contained in paragraph 5 of Microsoft's counterclaims except as follows. Plaintiff admits that on May 23, 2013, it filed a complaint for patent infringement against Microsoft, alleging infringement of United States Patent No. 6,006,277 ('227 Patent). Plaintiff admits that Microsoft asserts that the '227 Patent is invalid. Plaintiff admits that Microsoft asserts that it has not infringed and is not infringing the '227 Patent. Plaintiff denies that the '227 Patent is invalid, and denies that Microsoft has not infringed and is not infringing the '227 Patent.

6. Plaintiff admits that on September 23, 2013, it filed a first amended complaint for patent infringement against Microsoft, alleging infringement of the '227 patent.

7. Upon information and belief, Plaintiff admits that there is an actual and justiciable controversy between Microsoft and Mirror Worlds concerning the infringement and validity of the '227 patent. Plaintiff admits that the Court has personal jurisdiction over Mirror Worlds.

8. Plaintiff denies the allegations contained in paragraph 8 of Microsoft's counterclaims, except that it admits that venue is proper in this District.

9. Plaintiff denies the allegations contained in paragraph 8 of Microsoft's counterclaims.

**Count I – Declaratory judgment of non-infringement**

10. Plaintiff incorporates by reference its response to the allegations of paragraphs 1 through 9 of Microsoft's counterclaims. Except as expressly admitted, Plaintiff denies each of the allegations of paragraph 10.

11. Plaintiff admits the allegations contained in paragraph 11 of Microsoft's counterclaims.

12. Plaintiff admits the allegations contained in paragraph 21 of Microsoft's counterclaims.

13. Plaintiff denies the allegations contained in paragraph 13 of Microsoft's counterclaims, except that it admits that Microsoft denies that it has infringed or is infringing the '227 patent. Plaintiff denies that Microsoft has not infringed or is not infringing the '227 patent.

14. Upon information and belief, Plaintiff admits the allegations contained in paragraph 14 of Microsoft's counterclaims.

15. Plaintiff denies the allegations contained in paragraph 15 of Microsoft's counterclaims, except that it admits that Microsoft requests a declaration from the Court that it did not infringe and is not infringing any claim of the '227 patent. Plaintiff denies that Microsoft is entitled to the relief it seeks.

### **Count II – Declaratory judgment of invalidity**

16. Plaintiff incorporates its response to the allegations of paragraphs 1 through 15 of Microsoft's counterclaims. Except as expressly admitted, Plaintiff denies each of the allegations of paragraph 16.

17. Plaintiff admits the allegations contained in paragraph 17 of Microsoft's counterclaims.

18. Plaintiff admits the allegations contained in paragraph 18 of Microsoft's

counterclaims.

19. Plaintiff denies the allegations contained in paragraph 18 of Microsoft's counterclaims, except that it admits that Microsoft requests a declaration from the Court that each claim of the '227 patent is invalid. Plaintiff denies that Microsoft is entitled to the relief it seeks.

**Prayer for relief**

Plaintiff denies that Microsoft is entitled to the relief that it seeks as set forth in paragraph 113 and sub-paragraphs (A) through (H) of its prayer for relief, or any relief for the allegations made in its counterclaims.

Date: October 31, 2013

Respectfully submitted,

By: /s/ Simon Franzini  
Simon Franzini  
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(admitted to practice before the U.S. District Court for the Eastern District of Texas)  
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**Certificate of Service**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all parties not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 31st day of October, 2013.

*/s/ Simon Franzini*  
Simon Franzini